

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

MICHAEL BRIGGS,

Plaintiff,

v.

No. 1:20-cv-0651 KWR/JMR

THE UNIVERSITY OF NEW MEXICO, a  
public university, THE BOARD OF REGENTS  
OF THE UNIVERSITY OF NEW MEXICO,  
GARNETT STOKES, individually and in her  
official capacity, PAUL B. ROTH, individually  
and in his official capacity, DOROTHY  
ANDERSON, individually and in her official  
Capacity, LAURA VELE BUCHS, individually  
and in her official capacity, and KEVIN GICK,  
individually and in his official capacity,

Defendants.

**[UNOPPOSED] MOTION TO EXTEND TIME FOR  
PLAINTIFF TO IDENTIFY UNM COMPLAINT FILES**

Plaintiff Michael Briggs moves the Court to extend the time for Plaintiff to identify the 250 uninvestigated cases referred to in the Court's the Order Granting in Part Motion to Quash or Modify Subpoena (Doc. 110) (the "Order") until May 17, 2024, and as grounds therefore states:

On April 11, the Court entered an Order requiring, *inter alia*, that (1) UNM produce 130 case files arising from certain complaints investigated by UNM;<sup>1</sup> and (2) directing Plaintiff to limit its request for additional case files to 250 uninvestigated cases. Order at 1 (Doc. 110).

---

<sup>1</sup> In its *Reply in Support of Motion to Quash or Modify Subpoena* (Doc. 104), Defendants explained that the parties had narrowed the scope of potential UNM files to be produced to 1,701 complaints between January 1, 2017 and December 31, 2022 arising from allegations of sexual assault, sexual misconduct, or sexual violence. Reply at 2. The parties had also agreed to limit the types of records within those files. *Id.* Of those 1,701 files, Defendants indicated that "only 130 were investigated, with 60 findings of No Policy Violation and 70 findings of Policy Violation." *Id.* at 5.

Following the Court's entry of the Order, an issue has arisen with respect to the identification of the 130 investigated cases. Plaintiff cannot identify the 250 additional cases until the parties first eliminate the 130 investigated cases. The parties have been meeting and conferring to try to resolve the issue and request an extension to May 17, 2024, for Plaintiff to identify the 250 cases that were not investigated.

3. There is currently no trial setting and the Parties do not anticipate that this extension will impact the other deadlines set in this case.

4. Defendants do not oppose the extension.

**WHEREFORE**, Plaintiff requests that the Court enter an Order extending the time for Plaintiff to identify the additional 250 uninvestigated cases until May 17, 2024.

**JACKSON LOMAN STANFORD DOWNEY &  
STEVENS-BLOCK, P.C.**

By: /s/ Travis G. Jackson

Travis G. Jackson  
Sarah K. Downey  
201 Third Street, NE, Suite 1500  
Albuquerque, New Mexico 87102  
Telephone: (505) 767-0577  
Email: [travis@jacksonlomanlaw.com](mailto:travis@jacksonlomanlaw.com)  
Email: [sarah@jacksonlomanlaw.com](mailto:sarah@jacksonlomanlaw.com)  
*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7th day of May, 2024, the forgoing was filed electronically through CM/ECF system, which caused all parties of record to be served by electronic means.

By: /s/ Travis G. Jackson

Travis G. Jackson